

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____	}	
UNITED STATES OF AMERICA	}	
	}	
V.	}	CRIMINAL ACTION
	}	NO. 04-10390-WGY
MICHAEL AMBERS	}	
DEFENDANT	}	
_____	}	

DEFENDANT MICHAEL AMBERS MOTION TO CONTINUE TRIAL

Now comes the Defendant, Michael Ambers, by and through his counsel, Frank D. Camera, hereby requests this Court continue the trial that is currently scheduled for December 5, 2005 for two weeks, as per the Pretrial Order dated October 24, 2005, and that he be given an extension to comply with the Pretrial Order.

Good cause exists for this extension in that the Defendant appeared at the Taunton District Court on November 21, 2005 for a hearing on a Motion For A New Trial. As the Court is aware, Mr. Ambers is considered an Armed Career Criminal. The hearing was continued to December 5, 2005 due to the government not being adequately prepared to litigate this motion. Further, defense counsel will be out of state on a pre-planned vacation from November 22, 2005 to December 3, 2005. If this Motion For A New Trial is allowed, the defendant will be entering a change of plea on this matter. The Government assents to the continuance of this trial and any extension will not interfere or prejudice the Government in preparing its case. Counsel, on behalf of the Defendant, assents to this Court excluding from the Speedy Trial Act this period of time.

Respectfully Submitted,
Michael Ambers,
By his attorney,

/s/ Frank D. Camera

Frank D. Camera
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Dated: November 21, 2005

CERTIFICATE OF SERVICE

I, Frank D. Camera, hereby certify that I have delivered a true copy of the within document to all parties of record by electronic filing on this 21st day of November 2005.

/s/ Frank D. Camera